

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

Case No: 1:17-MD-2804

THIS DOCUMENT RELATES TO:
Track Three Trial

**WALMART'S MOTION TO SEAL PORTIONS OF THEIR MOTION *IN LIMINE*
TO PRECLUDE THE USE OF MISLEADING HANDWRITTEN NOTES AND
PREVENT THEM FROM BEING ADMITTED AS EVIDENCE**

Pursuant to MDL CMO-2 (Dkt. 441), Defendant Walmart Inc. respectfully moves this Court for leave to seal two exhibits supporting a motion *in limine* and to also redact portions of the motion that refer to those exhibits, which are being filed concurrently herewith.

Specifically, Walmart seeks leave to seal exhibits concerning Brad Nelson's March 23, 2021 deposition, which contain portions of the deposition that Walmart has designated Confidential or Highly Confidential pursuant to MDL CMO-2, or purported summaries of same. Moreover, because Defendants' motion relies, in part, on Nelson's transcript, Walmart also seeks leave to redact portions of the Defendants' motion that describe or quote portions of Nelson's testimony.

Accordingly, Walmart requests that the Court grant permission for Defendants to file excerpts of Nelson's March 23, 2021 (Exhibit C) and an exhibit generated during that deposition (Exhibit D) entirely under seal and to redact portions of their motion relying on those exhibits.

Dated: August 12, 2021

Respectfully submitted,

/s/ John M. Majoras

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record on August 12, 2021.

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